

The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

TSR LLC,

Plaintiff,

v.

WIZARDS OF THE COAST LLC,

Defendant.

Case No.: 2:21-cv-01705-SKV

**DECLARATION OF DAVE JOHNSON  
IN SUPPORT OF THE  
COUNTERCLAIM DEFENDANTS'  
RESPONSE TO MOTION FOR A  
PRELIMINARY INJUNCTION**

WIZARDS OF THE COAST LLC,

Counterclaim Plaintiff,

v.

TSR LLC; JUSTIN LANASA; and DUNGEON  
HOBBY SHOP MUSEUM LLC,

Counterclaim Defendants.

I, Dave Johnson, declare as follows:

1. I am a gaming writer who worked with TSR LLC ("TSR"), through Justin LaNasa ("Mr. LaNasa"), to co-write the transcript for the Star Frontiers New Genesis game ("SFNG Game"). All of the statements in this declaration are made based on personal knowledge.

2. I submit this declaration in support of Plaintiff and Counterclaim Defendants' Response to Defendant and Counterclaim Plaintiff's Motion for a Preliminary Injunction. In this

DECLARATION OF DAVE JOHNSON IN SUPPORT OF THE  
COUNTERCLAIM DEFENDANTS' RESPONSE TO MOTION  
FOR A PRELIMINARY INJUNCTION

Immix Law Group PC  
400 Winslow Way E. Suite 210  
Bainbridge Island, WA 98110  
Phone: (503) 802-5533  
Facsimile: (503) 802-5351

Page 1

1 declaration, I will refer to TSR, Mr. LaNasa, and Dungeon Hobby Shop Museum LLC collectively  
2 as the “Counterclaim Defendants.” I will refer to Defendant and Counterclaim Plaintiff Wizards  
3 of the Coast LLC as “Wizards.”

4 3. In the fall of 2021 and into 2022, I worked with TSR (through Mr. LaNasa) to co-  
5 write a transcript for a new game, which would become the SFNG Game. I did this as a volunteer  
6 and only asked for author credit.

7 4. The SFNG Game that I co-wrote with TSR did not include any racist, transphobic,  
8 or otherwise offensive content.

9 5. Mr. LaNasa told me that he shared the Google Doc document version of the  
10 transcript with Wizard Tower Games (“WTG”), through its owner Don Semora (“Mr. Semora”),  
11 so that WTG could provide printing, binding, and editing services to help us in finalizing the game  
12 (and for no other reason). My understanding is that this copy was provided confidentially and  
13 protected by a non-disclosure agreement between Mr. Semora and TSR.

14 6. I did not distribute the Google Doc document version of the SFNG Game to anyone  
15 except for Mr. LaNasa, at any time. I never shared this document with Wizards.

16 7. No one with the name “Larry Schroeder” or the email address  
17 “larryschroeder1947@gmail.com” is in any way affiliated with me. The “Star Frontiers Not  
18 Genuine” game that was posted on the Lulu Press, Inc. website is not in any way affiliated with  
19 the draft version of the SFNG Game that was co-written by me and TSR, which I was told was  
20 confidentially provided to Mr. Semora.

21 8. I do not know where any of the altered, unauthorized versions of the SFNG Game  
22 that were posted on the internet came from (including the version described in paragraph 7 above  
23 and the version that has been filed by Wizards as Exhibit E to the motion, which has been provided  
24 to me). I do not agree with or approve of any of the offensive content highlighted in Exhibit E—  
25 whether racial, gender-based, or otherwise. I did not make or approve of any edits to incorporate  
26 this offensive content into the SFNG Game transcript that TSR and I co-wrote, at any time. I am

1 offended and outraged by this content and by the fact that a third party would modify the game I  
2 worked on to incorporate such material and then falsely attribute the offensive material to me.

3 9. To my knowledge, the SFNG Game transcript is not available to the public. I have  
4 never shared a copy of the transcript with Wizards.

5 10. The last version of the SFNG Game in which I had any input was the version of the  
6 transcript that was printed and put in a three-ring binder that I was told WTG provided to TSR  
7 after it claimed to have completed the editing process, which did not include any racist,  
8 transphobic, or otherwise offensive content.

9 11. To the best of my knowledge, Mr. Semora/WTG was the only third party with  
10 editing authority and access to the original SFNG Game transcript.

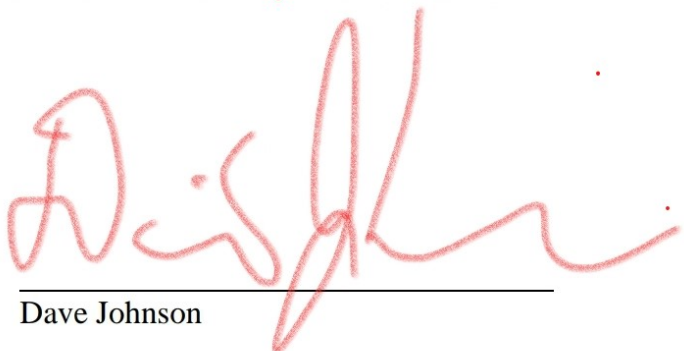
11 12. I never gave Mr. Semora or anyone else permission to publish, release, or distribute  
12 the SFNG Game, especially not a version that had been modified to include offensive and  
13 inflammatory content.

14 13. The only versions of the SFNG Game that represent my work product are the draft  
15 Google Doc transcript that Mr. LaNasa provided to WTG through Mr. Semora, and the version  
16 that I was told WTG provided to TSR in three-ring binders after I was told that it claimed to have  
17 completed the editing process. Neither of these versions contained offensive racial or gender-  
18 based content, and I did not at any time make or approve of any edits to incorporate such content.

19 **I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF**  
20 **MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE**  
21 **AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.**

22 DATED October 10, 2022

23  
24  
25  
26



Dave Johnson

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2022, I caused to be served a true copy of the foregoing **DECLARATION OF DAVE JOHNSON IN SUPPORT OF THE COUNTERCLAIM DEFENDANTS' RESPONSE TO MOTION FOR A PRELIMINARY INJUNCTION** on the party or attorneys listed below, by email:

Stuart R. Dunwoody  
Lauren B. Rainwater  
Eric A. Franz  
MaryAnn T. Almeida  
Rose McCarty  
Lisa Merritt  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Ave., Suite 3300  
Seattle, WA 98104  
stuardunwoody@dwt.com  
laurenrainwater@dwt.com  
ericfranz@dwt.com  
maryannalmeida@dwt.com  
rosemccarty@dwt.com  
lisamerritt@dwt.com  
Phone: (206) 622-3150

*Attorneys for Defendant/Counterclaim  
Plaintiff Wizards of the Coast LLC*

Russell D. Nugent  
THE HUMPHRIES LAW FIRM P.C.  
1904 Eastwood Rd, Ste 310A  
Wilmington, NC 28403  
russell@kinglawonline.com  
Phone: 910-899-0236

*Accepted Pro Hac Vice for Plaintiff TSR  
LLC, and Counterclaim Defendants TSR  
LLC, Justin LaNasa, and Dungeon Hobby  
Shop Museum LLC*

  
Dayna J. Christian, WSB No. 32459  
IMMIX LAW GROUP PC  
400 Winslow Way E., Suite 210  
Bainbridge Island, WA 98110  
Dayna.Christian@immixlaw.com  
Phone: (503) 802-5533

*Attorneys for Plaintiff and Counterclaim Defendant  
TSR LLC and Counterclaim Defendants Justin  
LaNasa and Dungeon Hobby Shop Museum LLC*